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ATTORNEYS FOR DEFENDANT
OCEANOGRAFIA S.A. DE C.V.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DREDGING INTERNATIONAL MEXICO S.A. DE
C.V.,

Plaintiff,

-against-

OCEANOGRAFIA S.A. DE C.V.,

Defendant.

07 Civ.11394 (GEL)

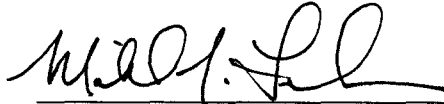
NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the Affirmation of Michael J. Frevola dated March 26, 2008, the declaration of Manuel Juarez Perez dated March 25, 2008, and the accompanying Memorandum of Law in Support, and all pleadings heretofore had in this matter, Defendant Oceanografía S.A. de C.V. will move this Court, before the Honorable Gerard E. Lynch, United States District Judge, at 500 Pearl Street, Courtroom 6B, New York, New York, on a date to be set by this Honorable Court, for an order pursuant to Rule E(7)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, directing (a) Plaintiff Dredging International Mexico S.A. De C.V. to give security to the Defendant for

the damages demanded in the Defendant's counter-claim within 10 days from the issuance of the order; and (b) directing such other and further relief as the Court may deem proper.

Dated: New York, New York
March 26, 2008

HOLLAND & KNIGHT LLP

By: 

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